STATE OF MINNESOTA )
) ss. AFFIDAVIT OF MICHAEL N. CANNIZZARO, JR.
COUNTY OF RAMSEY )

- I, Michael N. Cannizzaro, Jr. being duly sworn under oath, depose and state as follows:
- 1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed for approximately eighteen years. I am currently assigned to the FBI Twin Cities Safe Streets Violent Gang Task Force and have been so assigned for approximately eight years. My duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of federal laws, particularly those laws found in Title 18 and Title 21 of the United States Criminal Code.
- 2. This affidavit is submitted in support of a criminal complaint against Tyrone Mashaun White (herein "White") on grounds that he willfully and knowingly possessed a firearm after being convicted of a crime punishable by a term of imprisonment exceeding one year, thereby committing a violation of Title 18 U.S.C. § 922(g)(1) (Possession of a Firearm by a Felon).
- 3. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant; and therefore, contains only a summary of relevant facts. The facts and information set forth in this affidavit are based on my personal observations, my training and experience, and, as specifically attributed below, information obtained from law enforcement officers, reports, and witnesses. To the extent that any information in the affidavit is not within my personal knowledge, it has been made available to me through law enforcement sources, and I believe such information to be reliable.

## PROBABLE CAUSE

4. Your Affiant and other law enforcement officers have been conducting an investigation of a group of criminal street gang members and their associates. These gang

members and associates are selling quantities of heroin, fentanyl-augmented heroin, fentanyl-augmented pills, cocaine and marijuana in the Minneapolis, Minnesota metropolitan area. Law enforcement has identified White as one of the individuals who is selling illicit narcotics for the group.

- 5. On July 27, 2022, law enforcement officers learned that White may be in the area of the Shingle Creek Crossing commercial shopping center in Brooklyn Center, Minnesota. Shortly thereafter, law enforcement officers initiated physical surveillance of White, who was observed in a 2021 maroon-colored Chevrolet Trailblazer SUV, bearing State of Minnesota license plate EVF381 (herein named "the Trailblazer"). Shortly thereafter, the Trailblazer was stopped and detained by marked patrol vehicles. White was arrested by law enforcement officers, after exiting the vehicle from the Trailblazer's driver's seat, without incident. A female passenger, later identified as White's young daughter, was also detained by law enforcement officers without incident. The daughter was later released to a family member.
- 6. The Trailblazer was searched following White's arrest, pursuant to a search warrant, authorized, approved and signed by a Hennepin County Judicial Officer. During the search of the Trailblazer, law enforcement officers located, identified, and seized items of evidence, including a black-colored Springfield Hellcat 9mm semi-automatic pistol bearing serial number BY317707. The pistol, which was observed by law enforcement officers to be loaded with one round of ammunition inside of the chamber, was recovered from the front glove box of the Trailblazer. Officers also located a small personal bag containing a pill bottle, which held eight multi-colored pills; clear tied-off baggies containing a white substance, and a zip lock bag containing an unidentified substance. Law enforcement officers had previously seen White carrying the bag on his person. A field test of one of the bindles indicated that the substance was

fentanyl. The weight of the baggies (with packaging) was approximately 2.5 grams. A field test of the pills indicated that they were methamphetamine. The total weight of the pills was approximately 1.9 grams. Officers also found on White's person \$1,433 in cash.

- Also on July 27, 2022, law enforcement officers executed two additional search warrants, both authorized, approved and signed by a Hennepin County Judicial Officer, at residences known to be utilized by White. One of those addresses was 5XXX 73rd Avenue North, Brooklyn Park, Minnesota. In the bedroom dresser, officers found a white plastic tub containing approximately 114 individually wrapped plastic baggies with what appeared to be fentanyl powder. Each bag weighed approximately 1 gram. A field test indicated that the substance was fentanyl. Also in the dresser were two digital scales with what appeared to be narcotics residue, as well as a box of latex gloves. The search revealed clothing, mailing, and other evidence indicating that White regularly lives at the residence. Law enforcement officers also learned that White regularly utilizes the Trailblazer as his own, personal vehicle, despite it being registered to an associate of White.
- 8. Based on the foregoing, it appears that White was engaged in drug trafficking. I know in my training and experience that firearms are common tools of the trade in drug trafficking. Drug traffickers regularly possess, carry, and use firearms to defend themselves, their drugs, and their cash; to enforce sales; and to attack rival drug traffickers.
- 9. I have reviewed White's criminal history, which indicates that White had the following convictions prior to July 27, 2022:
  - Felony 1st Degree Burglary, 2014, Hennepin County District Court;
  - Felony Domestic Assault, 2014, Hennepin County District Court;
  - Felony Terroristic Threats, 2011, Hennepin County District Court;

- Felony Possession by an Ineligible Person, 2011, Hennepin County District Court;
- Felony Predatory Offender Registration, 2010, Hennepin County District Court;
- · Felony Simple Robbery, 2009, Hennepin County District Court; and
- Felony Terroristic Threats, 2007, Goodhue County District Court.
- 10. In my training and experience, each of these offenses is punishable in the State of Minnesota by imprisonment for a term exceeding one year. I also noted that White has previously received sentences of imprisonment for terms in excess of 12 months, and therefore knew he had been convicted of at least one offense punishable by imprisonment for a term exceeding one year.
- 11. I have consulted with an interstate nexus expert of the Bureau of Alcohol, Tobacco, Firearms and Explosives, who has made a preliminary determination that the Springfield Hellcat 9mm semi-automatic pistol bearing serial number BY317707 was not manufactured in the State of Minnesota, and therefore necessarily traveled in interstate commerce to have been in Minnesota on July 27, 2022.
- 12. Based on the above information, I submit there is probable cause to believe that White did willfully and knowingly possess a firearm as a felon, thereby committing a violation of Title 18 U.S.C. § 922(g)(1) (Possession of a Firearm by a Felon).

Further your Affiant sayeth not.

Respectfully submitted,

Michael N. Cannizzaro, Jr.

Special Agent

Federal Bureau of Investigation

SUBSCRIBED and SWORN before me by reliable electronic means via FaceTime and email pursuant to Fed. R. Crim. P. 41(d)(3) on

This 5th day of August, 2022

he Honorable John F. Docherty United States Magistrate Judge

District of Minnesota